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★ JUL 11 2013 ★

JJD:MPC  
F.#2012R01138

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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TO BE FILED UNDER SEAL

UNITED STATES OF AMERICA

COMPLAINT AND  
AFFIDAVIT IN SUPPORT OF  
AN ARREST WARRANT

-against-

ZDENA HOCK,

(18 U.S.C. § 1343)

Defendant.

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**MJ-13-606**

EASTERN DISTRICT OF NEW YORK, SS:

LAUREN PAESE, being duly sworn, deposes and says that she is a Special Agent with the United States Postal Service, Office of Inspector General (the "Office of Inspector General"), duly appointed according to law and acting as such.

Upon information and belief, in or about and between January 2012 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ZDENA HOCK did knowingly and intentionally devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, transmitted and caused to be transmitted by means of wire communication in interstate commerce, signs, signals and sounds.

(Title 18, United States Code, Section 1343)

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

1. I have been a Special Agent with the Office of Inspector General for the past year. My knowledge of the information set forth in this affidavit is based upon my review of United States Postal Service and Department of Labor files, conversations with other law enforcement personnel, and my own observations.

2. On January 11, 2012, while employed as a secretary for the United States Postal Service (the "Postal Service") the defendant ZDENA HOCK claimed to have sustained an injury to her back and neck while filing paperwork.

3. On or about January 17, 2012, the defendant ZDENA HOCK hand delivered to the Postal Service a Department of Labor Form, Claim for Compensation (the "Labor Form"), dated January 16, 2012, which was signed by HOCK. On that form, HOCK claimed she had sustained a neck and back injury while working. As a direct result of her submission of the Labor Form, HOCK began receiving workers' compensation benefits on or about March 19, 2012.

4. In or about May 2012, the Office of Inspector General received information from the Postal Service of possible workers'

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<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause to arrest, I have not set forth all of the facts and circumstances of which I am aware. Moreover, where the statements of others are reported herein, they are reported in sum and substance and in part, except where otherwise indicated.

compensation fraud related to the defendant ZDENÄ HOCK. Specifically, the Postal Service informed the Office of Inspector General that HOCK took six days to report the claimed injury and that Postal Service management could not confirm or refute HOCK's claim of a work related injury because of HOCK's delay in reporting the incident.

5. Postal Service and Department of Labor records indicate that between March 2012 and the present, the defendant ZDENÄ HOCK has received over \$50,100 in federal disability benefits and currently receives approximately \$1,300 every two weeks in the form of a wire transfer from the United States Department of Treasury, Kansas City, Missouri Regional Financial Center to HOCK's Citibank checking account. HOCK is required to submit to routine required medical examinations approximately every four to six weeks in order to continue to qualify for disability benefits. During these medical examinations she repeatedly has claimed that she is unemployed and incapable of continuing to work for the Postal Service due to her injury. These forms are then mailed by HOCK to the Postal Service.

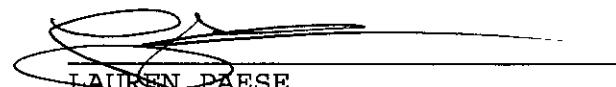
6. Between June 2012 and the present, I have conducted visual surveillance of the defendant ZDENÄ HOCK on numerous occasions. During my surveillance, I have observed HOCK engaged in physical activities, including attending social events, shopping and

exercise. During my surveillance, I also observed HOCK carrying groceries and other miscellaneous items. While she was carrying these items, I have observed HOCK walk distances in excess of a quarter mile. During my surveillance, HOCK never exhibited any signs of injuries to her back or neck. Additionally, between June 2012 and August 2012, I observed HOCK attend a community pool approximately three times per week. While at the pool, HOCK engaged in recreational activities, including jumping into the pool, swimming laps, walking up stairs without assistance and stretching while seated pool side.

7. On December 11, 2012, the defendant ZDENA HOCK attended a case review related to her disability claim. This interview was recorded. During the interview, HOCK again claimed a physical disability and described her pain as between "strong and severe" and described her lifestyle as "almost no activity." HOCK also claimed that she could not walk without extreme pain and that she only left her apartment to sit in her car because she wanted sunlight and could not sit on the benches outside her apartment because they were too hard.

8. On May 31, 2013, I observed the defendant ZDENA HOCK in a bathing suit, leaning over to gather objects from the trunk of a vehicle. On the same day, I also observed HOCK run errands to a local pharmacy with no visible physical impediments.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant ZDENA HOCK so that she may be dealt with according to law. Given the nature of this application, your deponent respectfully requests that this Affidavit and the Arrest Warrant be filed under seal until further order of the Court.



LAUREN PAESE  
Special Agent  
U.S. Postal Service  
Office of Inspector General

Sworn to before me this  
11th day of July, 2013  


HONORABLE A. KATHLEEN TOMLINSON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK